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Netflix, Inc., and  
Netflix Worldwide Entertainment, LLC

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

FIONA HARVEY,

Plaintiff,

v.

NETFLIX, INC., and NETFLIX  
WORLDWIDE ENTERTAINMENT,  
LLC,

Defendants.

Case No. 2:24-cv-04744-RGK-AJR

**[PROPOSED] ORDER GRANTING  
DEFENDANTS' APPLICATION  
FOR LEAVE TO FILE  
DOCUMENTS IN SUPPORT OF  
DEFENDANTS' SPECIAL MOTION  
TO STRIKE UNDER SEAL**

Hon. R. Gary Klausner

**[PROPOSED] ORDER**

This matter is before the Court on Defendants Netflix, Inc. and Netflix Worldwide Entertainment, LLC's (collectively, "Netflix" or "Defendants") Application for Leave to File Documents in Support of Defendants' Special Motion to Strike Under Seal, pursuant to Local Rule 79-5.2.2(a).

Having considered Defendants' Application for Leave to File Documents Under Seal and the Declaration of Marvin S. Putnam in Support of Defendants' Application for Leave to File Documents in Support of Defendants' Special Motion to Strike Under Seal, the Court finds that compelling reasons justify sealing the below-referenced materials because those materials contain third party personally identifiable information and/or information that might become a vehicle for improper purposes. *See Activision Publ'g, Inc. v. EngineOwning UG*, 2023 WL 2347134, at \*1 (C.D. Cal. Feb. 27, 2023); *Stiner v. Brookdale Senior Living, Inc.*, 2022 WL 1180216, at \*2 (N.D. Cal. Mar. 30, 2022); *Kamakana v. City & Cnty. of Honolulu*, 447 F.3d 1172, 1179 (9th Cir. 2006); *United States v. Amodeo*, 71 F.3d 1044, 1050 (2d Cir. 1995); *Mendiola v. Regents of Univ. of California*, 2021 WL 9721281, at \*1 (C.D. Cal. Dec. 1, 2021); *Opperman v. Path, Inc.*, 2017 WL 1036652, at \*4 (N.D. Cal. Mar. 17, 2017); *Altemus v. Amazon.com Servs. LLC*, 2024 WL 1078245, at \*2 (S.D. Cal. Mar. 12, 2024).

The application is hereby **GRANTED**. Accordingly, the following documents and portions of documents shall be filed under seal:

Document	Portions to be sealed
Declaration of Richard Gadd in Support of Defendants' Special Motion to Strike ("Gadd Decl."), Exhibit 1	Redacted portions
Gadd Decl., Exhibit 2	Redacted portions
Gadd Decl., Exhibit 3	Redacted portions
Gadd Decl., Exhibit 4	Redacted portions

1	Gadd Decl., Exhibit 5	Redacted portions
2	Gadd Decl., Exhibit 6	Redacted portions
3	Gadd Decl., Exhibit 7	Redacted portions
4	Gadd Decl., Exhibit 8	Redacted portions
5	Gadd Decl., Exhibit 9	Redacted portions
6	Gadd Decl., Exhibit 10	Redacted portions
7	Gadd Decl., Exhibit 11	Redacted portions
8	Gadd Decl., Exhibit 12	Redacted portions
9	Gadd Decl., Exhibit 13	Redacted portions
10	Gadd Decl., Exhibit 14	Redacted portions
11	Gadd Decl., Exhibit 15	Redacted portions
12	Gadd Decl., Exhibit 16	Redacted portions
13	Gadd Decl., Exhibit 17	Redacted portions
14	Gadd Decl., Exhibit 18	Redacted portions
15	Gadd Decl., Exhibit 19	Redacted portions
16	Gadd Decl., Exhibit 20	Redacted portions
17	Gadd Decl., Exhibit 21	Redacted portions
18	Gadd Decl., Exhibit 22	Redacted portions
19	Gadd Decl., Exhibit 23	Redacted portions
20	Gadd Decl., Exhibit 24	Redacted portions
21	Gadd Decl., Exhibit 25	Redacted portions
22	Gadd Decl., Exhibit 26	Redacted portions
23	Gadd Decl., Exhibit 27	Redacted portions
24	Gadd Decl., Exhibit 28	Redacted portions
25	Gadd Decl., Exhibit 29	Redacted portions
26	Gadd Decl., Exhibit 30	Redacted portions
27	Gadd Decl., Exhibit 31	Redacted portions
28	Gadd Decl., Exhibit 32	Redacted portions
	Gadd Decl., Exhibit 33	Redacted portions
	Gadd Decl., Exhibit 34	Redacted portions
	Gadd Decl., Exhibit 35	Redacted portions
	Gadd Decl., Exhibit 36	Redacted portions
	Gadd Decl., Exhibit 37	Redacted portions
	Gadd Decl., Exhibit 38	Redacted portions
	Gadd Decl., Exhibit 39	Redacted portions
	Gadd Decl., Exhibit 40	Redacted portions
	Gadd Decl., Exhibit 41	Redacted portions
	Gadd Decl., Exhibit 43	Redacted portions
	Gadd Decl., Exhibit 44	Redacted portions
	Gadd Decl., Exhibit 45	Entire exhibit

Gadd Decl., Exhibit 46	Redacted portions
Gadd Decl., Exhibit 47	Entire exhibit
Gadd Decl., Exhibit 48	Redacted portions
Gadd Decl., Exhibit 49	Entire exhibit
Gadd Decl., Exhibit 50	Entire exhibit
Gadd Decl., Exhibit 51	Redacted portions
Gadd Decl., Exhibit 53	Redacted portions
Gadd Decl., Exhibit 54	Redacted portions
Gadd Decl., Exhibit 55	Redacted portions
Gadd Decl., Exhibit 56	Redacted portions
Gadd Decl., Exhibit 57	Redacted portions
Gadd Decl., Exhibit 58	Redacted portions
Gadd Decl., Exhibit 59	Redacted portions
Gadd Decl., Exhibit 60	Redacted portions
Declaration of Laura Wray in Support of Defendants' Special Motion to Strike, Exhibit 7	Redacted portions
Declaration of Richard Gadd in Support of Defendants' Special Motion to Strike, paragraph 65	Redacted portions

**IT IS SO ORDERED.**

Dated: \_\_\_\_\_, 2024

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Hon. R. Gary Klausner  
United States District Judge